

McDermott Will & Emery

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Christine M. Gill
Attorney at Law
cgill@mwe.com
202.756.8283

September 28, 2005

Filed Electronically

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* Submission of PSAP Letters Regarding SouthernLINC Wireless's Request for Waiver; CC Docket No. 94-102

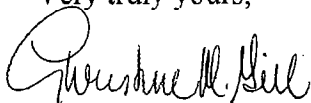
Dear Ms. Dortch:

On July 26, 2005, Southern Communications Services, Inc. d/b/a SouthernLINC Wireless ("SouthernLINC Wireless") filed with the Commission a Request for Waiver of Section 20.18(g)(1)(v) of the Commission's Rules, 47 C.F.R. § 20.18(g)(1)(v), which requires commercial mobile radio service (CMRS) providers utilizing handset-based E911 Phase II solutions to achieve ninety-five percent penetration of automatic location identification (ALI)-capable handsets among their subscribers by December 31, 2005.

In order to assist the Commission in its consideration of the requested waiver, SouthernLINC Wireless hereby provides the attached letters from representatives of various Public Safety Answering Points (PSAPs) located in SouthernLINC Wireless's service territory regarding SouthernLINC Wireless's waiver request. SouthernLINC Wireless requests that these letters be included in the record and taken into consideration by the Commission as it reviews SouthernLINC Wireless's waiver request.

In accordance with the Commission's rules, one copy of this *ex parte* submission is being filed electronically for inclusion in the record of the above-referenced proceeding.

Very truly yours,



Christine M. Gill

Marlene H. Dortch
September 28, 2005
Page 2

cc: Michael Wilhelm
Jeffrey Cohen
Cathy Seidel
Nicole McGinnis

Att.



September 19, 2005

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: E9-1-1 Implementation: SouthernLINC Wireless Request for Waiver

Dear Ms. Dortch:

Shelby County 9-1-1 provides citizens of our community with enhanced 9-1-1 service for wired and wireless phone customers. We have been Phase II with our major wireless carriers for over two years and we just added T-Mobile so now we are 100% Phase II.

Phase II wireless has been a big improvement to the routing and processing of wireless calls and without the FCC's involvement we would still be struggling with Phase I from some carriers.

SouthernLINC Wireless has been one of the most cooperative carriers and does an excellent job of communications and outreach to the 9-1-1 community. Even when the news is not good, they are quick to make me aware of any situation that affects the delivery of 9-1-1 service.

I support SouthernLINC's request for a waiver of the FCC's December 31, 2005, deadline for achieving ninety-five percent penetration of location-capable handsets. SouthernLINC has made a good faith effort to get their customers to upgrade their handsets, but many will not go to the trouble of a special trip to a service center. The upgrade is being made by SouthernLINC when customers bring in handsets for other repairs or service which along with handset replacement will continue to improve the percentage.

Since a carrier can not force their customers to upgrade or buy a new handset, I would not expect to hold them responsible for the customer's choice. I would also argue that if carriers are required to pass non-initialized phones through to 9-1-1 they should not be penalized if paying customers fail to update their handsets.

Thanks again for the FCC's role in improving the delivery of 9-1-1 service and please call on me if I might be of assistance in any way.

Sincerely,

John R. Ellison
Executive Director

Shelby County 9-1-1
1004 County Services Drive, Pelham, AL 35124
205.439.6911 • Fax 205.439.6927



City of Homewood

FIRE & RESCUE SERVICE



John A. Bresnan
Fire Chief

Harold A. Parker
Deputy Chief
9-1-1 Director

September 16, 2005

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: E9-1-1 Implementation; SouthernLINC Wireless Request for Waiver

Dear Ms. Dortch:

The City of Homewood E9-1-1 provides citizens of our community with E9-1-1 Wireless Phase I and Phase II service. We work with the wireless carriers in our area to insure prompt implementation of these services to better serve our citizens. As explained below, we believe that SouthernLINC Wireless' request for a waiver of the FCC's handset deployment deadline is appropriate.

We have worked with SouthernLINC Wireless throughout this process, and they have given us effective and timely assistance in all of our deployment efforts. SouthernLINC Wireless has demonstrated the kind of proactive involvement, spirit of partnership and cooperation that is needed to bring E9-1-1 services to the public as promptly as possible. SouthernLINC Wireless informed us last summer of a problem that had just been discovered in the software of its new A-GPS handsets that affected the ability of these handsets to provide E9-1-1 location information. SouthernLINC Wireless informed us of the steps taken to ensure that customers would still be able to make 9-1-1 calls and of the efforts that are being taken to correct the A-GPS software problem so that these handsets will again be location-capable.

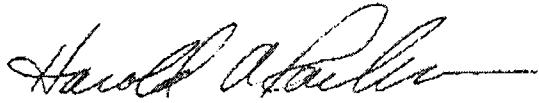
We understand that this A-GPS problem has had a significant impact on SouthernLINC Wireless's ability to ensure that its customers have location-capable handsets, and that SouthernLINC Wireless has formally requested a waiver of the FCC's December 31, 2005, deadline for achieving ninety-five percent penetration of location-capable handsets. Based on the level of effort SouthernLINC Wireless has already devoted to E9-1-1, we are confident that it

1903 29th Avenue South • Homewood, Alabama 35209
P.O. Box 59666 • Homewood, Alabama 35259
(205) 332-6154 • (205) 802-6404 Fax

will do everything it can to migrate as many of its customers as possible to location-capable handsets. We do not believe that SouthernLINC Wireless should be penalized if, despite these efforts, it cannot meet the FCC's handset deployment deadline due to circumstances that are beyond its control. Therefore, we believe that SouthernLINC Wireless's request for a waiver of the FCC's handset deployment deadline is appropriate.

Very truly yours,

Harold A. Parker
911 Director, City of Homewood
1903 29th Avenue South
Homewood Alabama, 35209
(205) 332-6154



WALKER COUNTY E 9-1-1



POLICE



FIRE



EMS

Roger Wilson, Director
(205) 221-7911

302 15th ST. NE
Jasper, Alabama 35504

September 16, 2005

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: E9-1-1 Implementation: SouthernLINC Wireless Request for Waiver

Dear Ms. Dortch:

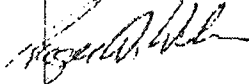
Walker County E9-1-1 provides citizens of our community with E9-1-1 Wireless Phase I and Phase II service. We work with the wireless carriers in our area to insure prompt implementation of these services to better serve our citizens. As explained below, we believe that SouthernLINC Wireless' request for a waiver of the FCC's handset deployment deadline is appropriate.

We have worked with SouthernLINC Wireless throughout this process, and they have given us effective and timely assistance in all of our deployment efforts. SouthernLINC Wireless has demonstrated the kind of proactive involvement, spirit of partnership and cooperation that is needed to bring E9-1-1 services to the public as promptly as possible. SouthernLINC Wireless informed us last summer of a problem that had just been discovered in the software of its new A-GPS handsets that affected the ability of these handsets to provide E9-1-1 location information. SouthernLINC Wireless informed us of the steps taken to ensure that customers would still be able to make 9-1-1 calls and of the efforts that are being taken to correct the A-GPS software problem so that these handsets will again be location-capable.

We understand that this A-GPS problem has had a significant impact on SouthernLINC Wireless's ability to ensure that its customers have location-capable handsets, and that SouthernLINC Wireless has formally requested a waiver of the FCC's December 31, 2005, deadline for achieving ninety-five percent penetration of location-capable handsets. Based on the level of effort SouthernLINC Wireless has already devoted to E9-1-1, we are confident that it will do everything it can to migrate as many of its customers as possible to location-capable handsets. We do not believe that SouthernLINC Wireless should be penalized if, despite these efforts, it cannot meet the FCC's handset deployment deadline due to circumstances that are

beyond its control. Therefore, we believe that SouthernLINC Wireless's request for a waiver of the FCC's handset deployment deadline is appropriate.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Roger D. Wilson", is written over the closing "yours,".

Roger D. Wilson, Director

TUSCALOOSA COUNTY
911 COMMUNICATION DISTRICT
2501 7th Street, Suite 300 • Tuscaloosa, Alabama 35401 • (205) 469-6384

Communications / Addressing / Mapping

Rod Coleman, Director

September 22, 2005

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: E9-1-1 Implementation; SouthernLINC Wireless Request for Waiver

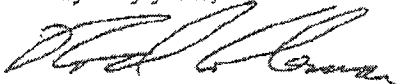
Dear Ms. Dortch:

Tuscaloosa County E9-1-1 provides citizens of our community with E9-1-1 Wireless Phase I and Phase II service. We work with the wireless carriers in our area to insure prompt implementation of these services to better serve our citizens. As explained below, we believe that SouthernLINC Wireless' request for a waiver of the FCC's handset deployment deadline is appropriate.

We have worked with SouthernLINC Wireless throughout this process, and they have given us effective and timely assistance in all of our deployment efforts. SouthernLINC Wireless has demonstrated the kind of proactive involvement, spirit of partnership and cooperation that is needed to bring E9-1-1 services to the public as promptly as possible. SouthernLINC Wireless informed us last summer of a problem that had just been discovered in the software of its new A-GPS handsets that affected the ability of these handsets to provide E9-1-1 location information. SouthernLINC Wireless informed us of the steps taken to ensure that customers would still be able to make 9-1-1 calls and of the efforts that are being taken to correct the A-GPS software problem so that these handsets will again be location-capable.

We understand that this A-GPS problem has had a significant impact on SouthernLINC Wireless's ability to ensure that its customers have location-capable handsets, and that SouthernLINC Wireless has formally requested a waiver of the FCC's December 31, 2005, deadline for achieving ninety-five percent penetration of location-capable handsets. Based on the level of effort SouthernLINC Wireless has already devoted to E9-1-1, we are confident that it will do everything it can to migrate as many of its customers as possible to location-capable handsets. We do not believe that SouthernLINC Wireless should be penalized if, despite these efforts, it cannot meet the FCC's handset deployment deadline due to circumstances that are beyond its control. Therefore, we believe that SouthernLINC Wireless's request for a waiver of the FCC's handset deployment deadline is appropriate.

Very truly yours,



Marion County E 9-1-1

650 3rd Ave S.W.

P.O. Box

Hamilton, Al. 35570

Phone (205) 921-0911

Fax (205) 921-5758

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: E9-1-1 Implementation; SouthernLINC Wireless Request for Waiver

Dear Ms. Dortch:

Marion County E9-1-1 provides citizens of our community with E9-1-1 Wireless Phase I and Phase II service. We work with the wireless carriers in our area to insure prompt implementation of these services to better serve our citizens. As explained below, we believe that SouthernLINC Wireless' request for a waiver of the FCC's handset deployment deadline is appropriate.

We have worked with SouthernLINC Wireless throughout this process, and they have given us effective and timely assistance in all of our deployment efforts. SouthernLINC Wireless has demonstrated the kind of proactive involvement, spirit of partnership and cooperation that is needed to bring E9-1-1 services to the public as promptly as possible. SouthernLINC Wireless informed us last summer of a problem that had just been discovered in the software of its new A-GPS handsets that affected the ability of these handsets to provide E9-1-1 location information. SouthernLINC Wireless informed us of the steps taken to ensure that customers would still be able to make 9-1-1 calls and of the efforts that are being taken to correct the A-GPS software problem so that these handsets will again be location-capable.

We understand that this A-GPS problem has had a significant impact on SouthernLINC Wireless's ability to ensure that its customers have location-capable handsets, and that SouthernLINC Wireless has formally requested a waiver of the FCC's December 31, 2005, deadline for achieving ninety-five percent penetration of location-capable handsets. Based on the level of effort SouthernLINC Wireless has already devoted to E9-1-1, we are confident that it will do everything it can to migrate as many of its customers as possible to location-capable handsets. We do not believe that SouthernLINC Wireless should be penalized if, despite these efforts, it cannot meet the FCC's handset deployment deadline due to circumstances that are beyond its control. Therefore, we believe that SouthernLINC Wireless's request for a waiver of the FCC's handset deployment deadline is appropriate.

Very truly yours,

Linda Winters
Director

Chairman

Lang Reese



**BOARD OF COUNTY
COMMISSIONERS**

www.co.bay.fl.us

September 19, 2005

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: E9-1-1 Implementation; SouthernLINC Wireless Request for Waiver

Dear Ms. Dortch:

POST OFFICE BOX 1818
PANAMA CITY, FL 32402

Bay County E9-1-1 provides citizens of our community with E9-1-1 Wireless Phase I and Phase II service. We work with the wireless carriers in our area to insure prompt implementation of these services to better serve our citizens.

COMMISSIONERS:

MIKE NELSON
DISTRICT I

GEORGE B. GAINER
DISTRICT II

WILLIAM T. DOZIER
DISTRICT III

JERRY L. GIRVIN
DISTRICT IV

MIKE THOMAS
DISTRICT V

JOY BATES
INTERIM COUNTY MANAGER

SouthernLINC Wireless has demonstrated the kind of proactive involvement, spirit of partnership and cooperation that is needed to bring E9-1-1 services to the public as promptly as possible. SouthernLINC Wireless informed us last summer of a problem that had just been discovered in the software of its new A-GPS handsets that affected the ability of these handsets to provide E9-1-1 location information. SouthernLINC Wireless informed us of the steps taken to ensure that customers would still be able to make 9-1-1 calls and of the efforts that are being taken to correct the A-GPS software problem so that these handsets will again be location-capable.

We understand that this A-GPS problem has had a significant impact on SouthernLINC Wireless's ability to ensure that its customers have location-capable handsets, and that SouthernLINC Wireless has formally requested a waiver of the FCC's December 31, 2005, deadline for achieving ninety-five percent penetration of location-capable handsets. Based on the level of effort SouthernLINC Wireless has already devoted to E9-1-1, we are confident that it will do everything it can to migrate as many of its customers as possible to location-capable handsets. We do not believe that SouthernLINC Wireless should be penalized if, despite these efforts, it cannot meet the FCC's handset deployment deadline due to circumstances that are beyond its control. Therefore, we believe that SouthernLINC Wireless's request for a waiver of the FCC's handset deployment deadline is appropriate.

Very truly yours,

TALLAPOOSA COUNTY E9-1-1

240 West Columbus Street
Dadeville, Alabama 36833-1311
(256) 825-8490 Office
(256) 825-0378 Fax
911@lakemartin.net

Amia Haggerty 9-1-1 Coordinator

"When Seconds Count"



Board Members
Baron Gregg - Chairman
David Wayne Key - Vice Chairman
Danny Lloyd - Secretary
Stan Merrett - Treasurer
Kenneth Thompson
Charlie Love
Lloyd Cotney

September 19, 2005

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: E9-1-1 Implementation; SouthernLINC Wireless Request for Waiver

Dear Ms. Dortch:

Tallapoosa County E9-1-1 provides citizens of our community with E9-1-1 Wireless Phase I and Phase II service. We work with the wireless carriers in our area to insure prompt implementation of these services to better serve our citizens. As explained below, we believe that SouthernLINC Wireless' request for a waiver of the FCC's handset deployment deadline is appropriate.

We have worked with SouthernLINC Wireless throughout this process, and they have given us effective and timely assistance in all of our deployment efforts. SouthernLINC Wireless has demonstrated the kind of proactive involvement, spirit of partnership and cooperation that is needed to bring E9-1-1 services to the public as promptly as possible. SouthernLINC Wireless informed us last summer of a problem that had just been discovered in the software of its new A-GPS handsets that affected the ability of these handsets to provide E9-1-1 location information. SouthernLINC Wireless informed us of the steps taken to ensure that customers would still be able to make 9-1-1 calls and of the efforts that are being taken to correct the A-GPS software problem so that these handsets will again be location-capable.

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Therefore, we believe that SouthernLINC Wireless's request for a waiver of the FCC's handset deployment deadline is appropriate.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Anita Haggerty".

Anita Haggerty

Tallapoosa County Enhanced 9-1-1 Coordinator



Board of Commissioners

Jack Hopper
Gordon Dunagan
Euell Hodge
Mary Paden
Gordon Sandlin
Clarice Shafer
Gay Neil Wilhite

Administrative Director

Roger Humphrey

September 16, 2005

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: E9-1-1 Implementation; SouthernLINC Wireless Request for Waiver

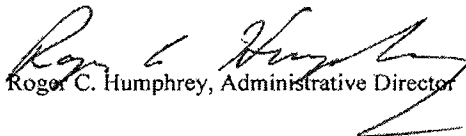
Dear Ms. Dortch:

Cullman County E9-1-1 provides citizens of our community with E9-1-1 Wireless Phase I and Phase II service. We work with the wireless carriers in our area to insure prompt implementation of these services to better serve our citizens. As explained below, we believe that SouthernLINC Wireless' request for a waiver of the FCC's handset deployment deadline is appropriate.

We have worked with SouthernLINC Wireless throughout this process, and they have given us effective and timely assistance in all of our deployment efforts. SouthernLINC Wireless has demonstrated the kind of proactive involvement, spirit of partnership and cooperation that is needed to bring E9-1-1 services to the public as promptly as possible. SouthernLINC Wireless informed us last summer of a problem that had just been discovered in the software of its new A-GPS handsets that affected the ability of these handsets to provide E9-1-1 location information. SouthernLINC Wireless informed us of the steps taken to ensure that customers would still be able to make 9-1-1 calls and of the efforts that are being taken to correct the A-GPS software problem so that these handsets will again be location-capable.

We understand that this A-GPS problem has had a significant impact on SouthernLINC Wireless's ability to ensure that its customers have location-capable handsets, and that SouthernLINC Wireless has formally requested a waiver of the FCC's December 31, 2005, deadline for achieving ninety-five percent penetration of location-capable handsets. Based on the level of effort SouthernLINC Wireless has already devoted to E9-1-1, we are confident that it will do everything it can to migrate as many of its customers as possible to location-capable handsets. We do not believe that SouthernLINC Wireless should be penalized if, despite these efforts, it cannot meet the FCC's handset deployment deadline due to circumstances that are beyond its control. Therefore, we believe that SouthernLINC Wireless's request for a waiver of the FCC's handset deployment deadline is appropriate.

Very truly yours,


Roger C. Humphrey, Administrative Director

September 19, 2005

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: E9-1-1 Implementation; SouthernLINC Wireless Request for Waiver

Dear Ms. Dortch:

Pickens County E9-1-1 provides citizens of our community with E9-1-1 Wireless Phase I and Phase II service. We work with the wireless carriers in our area to insure prompt implementation of these services to better serve our citizens. As explained below, we believe that SouthernLINC Wireless' request for a waiver of the FCC's handset deployment deadline is appropriate.

We have worked with SouthernLINC Wireless throughout this process, and they have given us effective and timely assistance in all of our deployment efforts. SouthernLINC Wireless has demonstrated the kind of proactive involvement, spirit of partnership and cooperation that is needed to bring E9-1-1 services to the public as promptly as possible. SouthernLINC Wireless informed us last summer of a problem that had just been discovered in the software of its new A-GPS handsets that affected the ability of these handsets to provide E9-1-1 location information. SouthernLINC Wireless informed us of the steps taken to ensure that customers would still be able to make 9-1-1 calls and of the efforts that are being taken to correct the A-GPS software problem so that these handsets will again be location-capable.

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Very truly yours,



Ken Gibson

Pickens County E911 Coordinator